

ORIGINAL

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*Attorneys for Defendants Dewey & LeBoeuf LLP,  
 Christopher DiAngelo and Roxana Bargo*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

COMUNITY COLLECTORS LLC,  
 GWENDOLYNN J. TYLER 2006  
 LIVING TRUST, W. DARRYL FRY, an  
 individual,

Plaintiffs,

MORTGAGE ELECTRONIC  
 REGISTRATION SERVICES, INC.;  
 TERWIN ADVISORS L.L.C. D/B/A/  
 THE WINTER GROUP; DEWEY &  
 LEBEOUF L.L.P.; CHRISTOPHER  
 DIANGELO; ROXANA BARGOZ;  
 THE BANK OF NEW YORK  
 MELLON; WILMINGTON TRUST  
 COMPANY; SPECIALIZED LOAN  
 SERVICING L.L.C.; DEUTSCHE  
 BANK AG; OSERBERG ASSET  
 MANAGEMENT LLC,

Defendants.

Case No. CV 11 4777

[Assigned to Hon. Edward M. Chen]

Complaint Filed: December 26, 2011

**DECLARATION OF STEVEN S. DAVIS IN  
 SUPPORT OF JOINT STIPULATION AND  
 [PROPOSED] ORDER TO EXTEND TIME  
 TO RESPOND TO THE COMPLAINT [Local  
 Rule 6.1(a), (b)]**

DECLARATION OF STEVEN S. DAVIS

GAIMS, WEIL, WEST & EPSTEIN, LLP  
 ATTORNEYS AT LAW  
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BY FAX

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1 I, Steven S. Davis, declare:

2 1. I am an attorney at law licensed to practice before all courts of the State of  
3 California. I am a member of Gaims, Weil, West & Epstein, LLP, attorneys of record for  
4 defendants Dewey & LeBoeuf L.L.P.; Christopher DiAngelo; and Roxana Bargo  
5 (collectively, "Dewey") in this action. I have personal knowledge of the following facts.  
6 If called upon to testify as a witness, I could and would testify competently to these  
7 facts under oath.

8 2. Plaintiffs and defendants Dewey, Specialized Loan Servicing L.L.C.  
9 ("SLS"), Deutsche Bank AG ("Deutsche Bank") and Oseberg Asset Management LLC  
10 ("Oseberg"), have previously agreed and stipulated that defendants shall respond to  
11 the complaint on various dates ranging from February 29, 2012 to March 12, 2012.

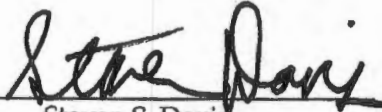
12 3. On February 27, 2012, I requested that plaintiffs' counsel Ted White agree  
13 that all appearing defendants may answer or otherwise serve a response to the  
14 complaint on the same date, namely March 12, 2012, and he graciously agreed. I so  
15 advised counsel for the other defendants who have appeared in this case.

16 4. Counsel for SLS, Deutsche Bank and Wilmington Trust Company have  
17 advised me that they wish to join in a Stipulation that so provides. Accordingly, I  
18 prepared such a Stipulation and [Proposed] Order that so provides and which is signed  
19 by the interested parties' counsel and attached to this declaration.  
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DECLARATION OF STEVEN S. DAVIS

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2 5. I respectfully request the Court on behalf of my clients Dewey, DiAngelo  
3 and Bargo and the other parties whose counsel have signed the attached Stipulation  
4 that the Court approve and enter it as the Court's Order.  
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6 I declare under penalty of perjury that the foregoing is true and correct and that  
7 this Declaration is executed on February 27, 2012, at Los Angeles, California.  
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10 Steven S. Davis  
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 Christopher DiAngelo and Roxana Bargo*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

COMUNITY COLLECTORS LLC,  
 GWENDOLYNN J. TYLER 2006  
 LIVING TRUST, W. DARRYL FRY, an  
 individual,

Plaintiffs,

v.

MORTGAGE ELECTRONIC  
 REGISTRATION SERVICES, INC.;  
 TERWIN ADVISORS L.L.C. D/B/A/  
 THE WINTER GROUP; DEWEY &  
 LEBEOUF L.L.P.; CHRISTOPHER  
 DIANGELO; ROXANA BARGOZ;  
 THE BANK OF NEW YORK  
 MELLON; WILMINGTON TRUST  
 COMPANY; SPECIALIZED LOAN  
 SERVICING L.L.C.; DEUTSCHE  
 BANK AG; OSERBERG ASSET  
 MANAGEMENT LLC,

Defendants.

Case No. CV 11 4777

[Assigned to Hon. Edward M. Chen]

Complaint Filed: December 26, 2011

**JOINT STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND TIME TO RESPOND  
 TO THE COMPLAINT [Local Rule 6.1(a), (b)]**

Case Management Conference: May 18, 2012

STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT



1 WHEREAS on January 16, 2012, plaintiffs COMUNITY COLLECTORS LLC,  
 2 GWENDOLYNN J. TYLER 2006 LIVING TRUST, and W. DARRYL FRY ("Plaintiffs")  
 3 served the summons and complaint on defendants DEWEY & LEBOEUF L.L.P.;  
 4 CHRISTOPHER DIANGELO; and ROXANA BARGOZ (collectively, "Dewey"), and  
 5 Dewey's response to the Complaint is currently due on February 29, 2012;

6 WHEREAS on January 18, 2012, Plaintiffs served the summons and complaint on  
 7 defendant SPECIALIZED LOAN SERVICING L.L.C. ("SLS"), and SLS's response to the  
 8 Complaint is currently due on February 29, 2012;

9 WHEREAS on January 18, 2012, Plaintiffs served the summons and complaint on  
 10 defendant DEUTSCHE BANK AG ("Deutsche Bank"), and Deutsche Bank's response to  
 11 the Complaint is currently due on March 6, 2012;

12 WHEREAS on January 19, 2012, Plaintiffs served the summons and complaint on  
 13 defendant OSEBERG ASSET MANAGEMENT LLC ("Oseberg"), and Oseberg's  
 14 response to the Complaint is currently due on March 12, 2012;

15 WHEREAS Dewey, SLS, Deutsche Bank, and Oseberg all have yet to answer or  
 16 otherwise respond to the Complaint;

17 WHEREAS on February 13, 2012, plaintiffs and defendants filed and the Court  
 18 entered a joint stipulation and Order continuing the Case Management Conference in  
 19 this case from February 17, 2012 to May 18, 2012 that so recites the foregoing;

20 WHEREAS plaintiffs and defendants Dewey, SLS, Deutsche Bank and  
 21 Wilmington Trust Company ("Wilmington") ("the Stipulating Parties") believe it will  
 22 promote efficiency and convenience for the Court and all parties to have all of the  
 23 foregoing defendants' responses to the complaint due on the same date; and

24 WHEREAS the Stipulating Parties have entered into this Stipulation, subject to  
 25 the Court's approval, to so provide.

26 NOW, THEREFORE, plaintiffs and defendants Dewey, SLS, Deutsche Bank and  
 27 Wilmington, through their respective counsel of record, stipulate and agree as follows:  
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 STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT

Defendants Dewey & LeBoeuf LLP, Christopher DiAngelo, Roxana Bargo, Specialized Loan Servicing L.L.C., Deutsche Bank AG and Wilmington Trust Company shall have to and including March 12, 2012, to answer or make any motion in response to the Complaint.

SO STIPULATED.

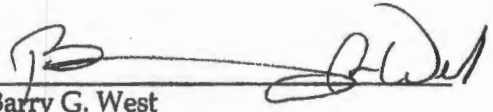
Dated: February \_\_, 2012

THE WHITE LAW FIRM

By: \_\_\_\_\_  
Edward K White III  
Attorneys for Plaintiffs  
COMMUNITY COLLECTORS LLC,  
GWENDOLYNN J. TYLER 2006 LIVING  
TRUST, and W. DARRYL FRY

Dated: February 27, 2012

GAIMS, WEIL, WEST & EPSTEIN, LLP

By:  \_\_\_\_\_  
Barry G. West  
Attorneys for Defendants  
DEWEY & LEBOEUF L.L.P.; CHRISTOPHER  
DIANGELO; and ROXANA BARGOZ

Dated: February \_\_, 2012

PALMER, LOMBARDI & DONOHUE LLP

By: \_\_\_\_\_  
Brett D. Watson  
Attorneys for Defendant  
SPECIALIZED LOAN SERVICING L.L.C. and  
WILMINGTON TRUST COMPANY

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Defendants Dewey & LeBoeuf LLP, Christopher DiAngelo, Roxana Bargo,  
Specialized Loan Servicing L.L.C., Deutsche Bank AG and Wilmington Trust Company  
shall have to and including March 12, 2012, to answer or make any motion in response  
to the Complaint.

SO STIPULATED.

<p>Dated: February <u>28</u> 2012</p>	<p>MILLER &amp; WRUBEL P.C.</p> <p>BY: <u>Claire Huene</u> Charles R. Jacob III Claire L. Huene Attorneys For Defendants SPECIALIZED LOAN SERVICING LLC (admitted pro hac) and WILMINGTON TRUST COMPANY (pro hac pending)</p>
<p>Dated: February <u>28</u> 2012</p>	<p>PALMER, LOMBARDI &amp; DONOHUE LLP</p> <p>BY: <u>Brett D. Watson</u> Brett D. Watson Attorneys For Defendants SPECIALIZED LOAN SERVICING LLC and WILMINGTON TRUST COMPANY</p>
<p>Dated: February <u>28</u> 2012</p>	<p>THE WHITE LAW FIRM</p> <p>By: <u>Edward K. White III</u> Edward K White III Attorneys for Plaintiffs COMMUNITY COLLECTORS LLC, GWENDOLYNN J. TYLER 2006 LIVING TRUST, and W. DARRYL FRY</p>

1  
2 Dated: February 27, 2012

MORGAN, LEWIS & BOCKIUS LLP

3  
4 By: 

Elizabeth A. Frohlich

Andrew M. Purdy

Attorneys for Defendant

DEUTSCHE BANK AG

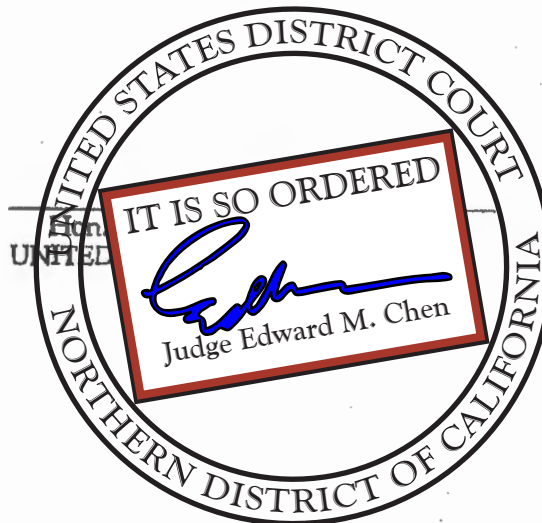
7  
8 **ORDER**

9 Pursuant to the stipulation, and GOOD CAUSE appearing therefor, the time for  
10 defendants Dewey, DiAngelo, Bargo, SLS, Wilmington and Deutsche Bank to answer or  
11 make any motion in response to the Complaint is hereby continued to March 12, 2012.

12  
13 IT IS SO ORDERED.

14 March 1, 2012

15 Dated: February 27, 2012



3  
STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT

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